

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
14 March 2022 10:52 AM lrs
Michelle Rynne, Clerk of Court

IN THE UNITED STATES DISTRICT COURT
FOR THE _____ DISTRICT OF Hawaii
_____ DIVISION

*(Write the District and Division, if any, of
the court in which the complaint is filed.)*

Geoffrey Philip Hughes

*(Write the full name of each plaintiff who is filing
this complaint. If the names of all the plaintiffs
cannot fit in the space above, please write "see
attached" in the space and attach an additional
page with the full list of names.)*

-against-

The Kalama Beach Corporation (Malama
Market Pahoehoe) (Craig Derasin, Kawaihi
Alejandro, Angel (employee))

*(Write the full name of each defendant who is
being sued. If the names of all the defendants
cannot fit in the space above, please write "see
attached" in the space and attach an additional
page with the full list of names.)*

Complaint for a Civil Case

Case No. 22-00099-JAO-KJM
(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Geoffrey Philip Hughes</u>
Street Address	<u>Po Box 11182, 154 Waiannuene Ave. Ste 1</u>
City and County	<u>Hilo</u>
State and Zip Code	<u>HI, 96721</u>
Telephone Number	<u>530-210-3258</u>
E-mail Address	<u>g.hughes00@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Kalama Beach Corporation</u>
Job or Title (if known)	<u>Malama Market Pahoa</u>
Street Address	<u>3536 Harding ave st 500</u>
City and County	<u>Honolulu</u>
State and Zip Code	<u>HI, 96816</u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	<u>Craig Derasin</u>
Job or Title (if known)	<u>Manager</u>
Street Address	<u>15-2714 Pahoa Village rd unit A</u>
City and County	<u>Pahoa</u>

State and Zip Code HI, 96778
 Telephone Number 808 965 2105
 E-mail Address _____
 (if known) _____

Defendant No. 3

Name Kawahi Alejandro
 Job or Title Manager
 (if known) _____
 Street Address 15-2714 Pahoa Village rd #A
 City and County ~~Hawaii~~ Pahoa
 State and Zip Code HI 96778
 Telephone Number 808 965 2105
 E-mail Address _____
 (if known) _____

Defendant No. 4

Name Angel (last name unknown)
 Job or Title employee / manager on duty
 (if known) _____
 Street Address 15-2714 Pahoa Village rd #A
 City and County Pahoa
 State and Zip Code HI, 96778
 Telephone Number 808 965 2105
 E-mail Address _____
 (if known) _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

U.S. Constitution 1st Amendment, 4th Amendment,
US title 52, Civil rights act of 1964, title 42 section
17101, U.S. Americans with disabilities Act

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of
the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name)
_____.

*(If more than one plaintiff is named in the complaint, attach an additional
page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

- b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$75,100 for damages for the time being harassed by employee, questioned afterwards, loss of ability to shop at local store, emotional/mental distress, public shame, stress

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On February 16th, 2022 plaintiff went to defendant's public place of business to buy groceries and was harassed, discriminated against, threatened, and kicked out of the store and given a no trespass notice lasting one year for asking employee and manager if they allow for medically exempt individuals to shop.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Damages asked for are \$75,100. Reasons include the great emotional distress, restricted access to local groceries for one year, headache, stomach ache from described incident, loss of time, being harassed, time spent and time and resources now needed for going to shop elsewhere.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: March 13, 2022

Signature of Plaintiff

Printed Name of Plaintiff


Geoffrey Hughes

B. For Attorneys

Date of signing: _____, 20__.